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6 **Attorneys for Plaintiff**

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 **JOE HAND PROMOTIONS, INC.,**

Case No.: 2:12-cv-01930-LRH-PAL

10 **Plaintiff,**

11 **vs.**

13 **EDEN J. STEAK LLC, DBA GEISHA**  
STEAK HOUSE AKA GEISHA HOUSE;  
14 **DONGHWAN PARK, INDIVIDUALLY**  
AND DBA GEISHA STEAK HOUSE AKA  
15 **GEISHA HOUSE, AND ALBERT S. LEE,**  
INDIVIDUALLY AND DBA GEISHA  
16 **STEAK HOUSE AKA GEISHA HOUSE,**

STIPULATED DISCOVERY PLAN AND  
SCHEDULING ORDER

17 **Defendant.**

18 The parties hereto, through their respective counsel, hereby submit the following  
19 proposed Stipulated Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil  
20 Procedure 26(f) and Local Rule 26-1.  
21

22 **1. Conference:** Pursuant to Federal Rule of Civil Procedure 26(f), counsel for the  
23 parties conferred telephonically on January 11, 2013. As required, during this conference  
24 counsel considered the nature and basis of their clients' claims and defenses and the possibility  
25 of prompt settlement of this action. Counsel discussed the timing and other arrangements  
26 pertaining to the initial disclosures required by Rule 26(a)(1), discussed issues concerning  
27 preservation of discoverable information and developed a proposed discovery plan.  
28

## **2. Discovery Plan:**

A. Initial Disclosures: Pursuant to Rule 26(a)(1)(C), and by agreement of the parties, the parties will exchange initial disclosures no later than January 25, 2013.

B. Areas of Discovery: Discovery will be needed to address all issues, including all claims and defenses within the scope of the parties' pleadings.

C. Discovery Cut-Off Date: The parties propose a discovery cutoff date of May 27, 2013, which is one hundred and twenty (120) days following the parties' proposed deadline for serving initial disclosures.

D. Amendments to Pleadings and Addition of Parties: Pursuant to Local Rule 26-1(e)(2), the parties shall have until February 25, 2013, to file any motions to amend the pleadings or to add parties. This date is ninety (90) days before the parties' proposed discovery cut-off date.

E. Federal Rule of Civil Procedure 26(a)(2) Expert Disclosures:

Disclosure of experts shall be made no later than March 26, 2013, which is the next closest day to sixty (60) days before the parties' proposed discovery cut-off date. Disclosures of any rebuttal experts shall be made no later than April 25 2013, which is within thirty (30) days after the parties' initial disclosure of experts.

F. Interim Status Report: Pursuant to Local Rule 26-3, the parties shall submit an interim status report no later than March 26, 2013, which is the next closest day to sixty (60) days before the parties' proposed discovery cut-off date.

1                   G. Dispositive Motions: Pursuant to Local Rule 26-1(e)(4), the  
2 parties shall have until June 24, 2013 to file dispositive motions. The date is  
3 within thirty (30) days after the parties' proposed discovery cut-off date.

4                   H. Pretrial Order: Pursuant to Local Rule 26-1(e)(5), the joint pretrial  
5 order shall be filed by July 24, 2013. This date is within thirty (30) days after the  
6 deadline for filing dispositive motions. In the event that dispositive motions are  
7 filed, the date for filing the joint pretrial order shall be suspended until thirty (30)  
8 days after decision on such motion(s) or further order of the Court. The  
9 disclosures required by Federal Rule of Civil Procedure 26(a)(3), and any  
10 objections thereto, shall be made in the joint pretrial order.

12                  **3. Limitations on Discovery:** At this time, the parties propose no changes to the  
13 form or scope of discovery imposed by the Federal Rules of Civil Procedure or the Local Rules,  
14 other than the extension of certain deadlines as noted above. The parties, however, reserve their  
15 right to seek changes to the limitations on the form or scope of discovery, as and if necessary, at  
16 a later date.

18                  **4. Court Conference:** The parties do not believe that a conference is necessary,  
19 unless the Court feels it would be useful to hear from the parties with respect to their proposed  
20 scheduling plan.

21                  DATED: January 14, 2013  
22                  **REYNOLDS & ASSOCIATES**

23                  \_\_\_\_\_  
24                  /s/ Matthew M. Reynolds  
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                      Attorney for Plaintiff

COHEN-JOHNSON LLC

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Attorney for Defendants

27                  IT IS SO ORDERED this 14th day of January, 2013.

  
\_\_\_\_\_  
Peggy A. Leen, U.S. Magistrate Judge